

**UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF MASSACHUSETTS**

Catherine Deegan Patterson, <i>et al.</i>)	
)	
)	
Plaintiffs,)	
)	
v.)	CIVIL ACTION NO. 04-11817 JLT
)	
United States of America, <i>et al.</i>)	
)	
Defendants.)	
)	

UNITED STATES' MOTION FOR LEAVE TO FILE REPLY BRIEF

Defendant United States of America moves this Honorable Court for leave to file a brief in reply to the Opposition of Plaintiffs To The United States' Motion To Dismiss, filed on February 22, 2005. On March 22, 2005, plaintiffs' filed Plaintiffs' Submission of Affidavit of Richard Deegan wherein material issues in this case were briefed and the affidavit of Richard Deegan was attached. The United States requests permission to submit a Reply Brief that will address the issues raised in plaintiffs' briefs and may assist this Court in resolving the motion.

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Because undersigned counsel is involved in active discovery in seven consolidated cases before the Honorable Judge Lindsay in this District, thirty days to submit a reply brief is requested.

Respectfully submitted,

PETER D. KEISLER
Assistant Attorney General

PHYLLIS J. PYLES
Director, Torts Branch

/s/ Bridget Bailey Lipscomb
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ATTORNEYS FOR THE
UNITED STATES

Undersigned counsel certifies that on March 23, 2005, pursuant to LR, D. Mass 7.1(a)(2), she attempted to confer with counsel of record for plaintiffs, Mr. Paul Denver, via telephone as to the filing of this motion. Counsel was unable to speak with Mr. Denver, so she left a voicemail message.

Date: March 23, 2005

Signed: /s/ Bridget Bailey Lipscomb
Bridget Bailey Lipscomb

CERTIFICATE OF SERVICE

I, Bridget Bailey Lipscomb, hereby certify that on March 23, 2005, I served a true copy of the United States Motion For Leave To File Reply Brief by U.S. mail on:

Neil Rossman
Paul F. Denver
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/s/Bridget Bailey Lipscomb
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